## Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of	)	
	)	
Federal-State Joint Board on	)	
Universal Service	)	CC Docket No. 96-45
	)	
Advantage Cellular Systems, Inc.	)	
	)	
Application for Designation as an	)	
Eligible Telecommunications Carrier	)	
in the State of Tennessee	)	

## COMPLIANCE FILING OF ADVANTAGE CELLULAR SYSTEMS, INC.

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys, pursuant to the Federal Communications Commission's ("FCC" or "Commission") *Order* in the above-referenced proceeding designating Advantage as an eligible telecommunications carrier (ETC)<sup>1</sup> and its 2005 *ETC Order*, hereby submits: (1) information on its progress towards meeting its five-year service quality improvement plan; (2) the number of outages lasting at least thirty minutes in Advantage's service area; (3) the number of unfulfilled requests for service from potential customers for the period between July 1, 2007 and June 30, 2008; (4) the number of complaints per 1,000 handsets or lines; (5) a certification that Advantage is complying with applicable service quality standards and consumer protection rules; (6) a certification that Advantage is offering a local usage plan comparable to that offered by the incumbent local exchange carrier

<sup>&</sup>lt;sup>1</sup> In re Federal-State Joint Board on Universal Service, Advantage Cellular Systems, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee, FCC Docket No. 96-45, Order, DA 04-3357 (October 22, 2004).

<sup>&</sup>lt;sup>2</sup> *In re Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, FCC 05-46 (March 17, 2005) (*ETC Order*).

("LEC") in the relevant service areas; and (8) a certification acknowledging that the Commission may require Advantage to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

#### I. Progress Towards Meeting its Five-Year Service Quality Improvement Plan

#### REDACTED

#### II. Advantage Did Not Experience Any Outages of 30 Minutes or More

Between July 1, 2007 and June 30, 2008, Advantage did not experience any service outage lasting at least 30 minutes for any facility or tower within Advantage's ETC designated service area that potentially affects at least 10% of the end users served in such designated area, or that potentially affects a 911 facility.<sup>3</sup> Advantage performs routine maintenance checks on its system to ensure quality service. In order to perform these maintenance checks, Advantage must turn off its service for a maximum of two to three minutes. Advantage performs these checks at night during periods of very low call volume so as not to interrupt service. Except in emergency situations, Advantage will notify its customers in advance of the maintenance check and possible service disruptions.

#### III. Advantage Fulfilled All of Its Service Requests

Between July 1, 2007 and June 30, 2008, Advantage did not have any unfulfilled service requests from potential customers.

ND: 4815-7190-2211, v. 1

<sup>&</sup>lt;sup>3</sup> On June 27, 2008, copper thieves cut guy wires on the Tracy City tower on which Advantage is co-located, causing the tower to collapse. This incident affects less than 10 percent of Advantage's customer base. As of the date of this submission, the tower is being rebuilt and Advantage anticipates restoring service by August 31, 2008.

### IV. Number of Complaints Per 1,000 Handsets

Advantage has received less than one complaint per 1,000 handsets. Specifically, Advantage received two complaints between July 1, 2007 and June 30, 2008, both filed with the FCC.

In April 2008, Greg Kane filed a complaint with the FCC regarding the alleged lack of connectivity between Crickett Communications and Advantage. On April 4, 2008, Advantage notified the FCC that Advantage reviewed the complaint and determined that the problem originates from a number porting issue on the end of Crickett Communications. To Advantage's knowledge, the complaint remains pending at the FCC.

In May 2008, Robert Mitchell filed a complaint with the FCC regarding the alleged inability to connect to toll-free numbers. On May 14, 2008, Advantage notified the FCC that Advantage had contacted Mr. Mitchell to assist in resolving the issue. To Advantage's knowledge, the complaint remains pending at the FCC.

#### V. Certifications

In compliance with the FCC's ETC requirements, attached hereto are certifications attesting that Advantage is: (1) complying with applicable service quality standards and consumer protection rules; (2) able to function in emergency situations; and (3) offering a local usage plan comparable to that offered by the incumbent LEC in the relevant service areas. Also in compliance with the FCC's requirements, attached is a certification acknowledging that the Commission may require Advantage to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.

If you need additional information regarding Advantage's ETC service, please contact the undersigned counsel.

Respectfully Submitted,

## ADVANTAGE CELLULAR SYSTEMS, INC.

/s/ Kenneth C. Johnson

By:\_\_\_\_\_

Kenneth C. Johnson Robert A. Silverman Bennet & Bennet, PLLC 4350 East West Highway Suite 201 Bethesda, MD 20814 (202) 371-1500

Its Attorneys

Dated: September 30, 2008

# **EXHIBIT A**

**REDACTED** 



## **Declaration of Leslie Greer**

- I, Leslie Greer, do hereby declare under penalty of perjury the following:
  - 1. I am the CEO of Advantage Cellular Systems, Inc. d/b/a DTC Wireless.
  - 2. I have read the foregoing "Compliance Filing of Advantage Cellular Systems, Inc." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.

Leslie Greer

September 25, 2008

Date



Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Emergency Certification for October Compliance Filing

Dear Ms. Dortch:

On behalf of Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), pursuant to the Federal Communications Commission's 2005 Universal Service Order, I hereby certify under penalty of perjury that Advantage is able to function in emergency situations. Advantage's emergency plan is attached hereto.

Leslie Greer

Advantage Cellular, Systems, Inc.

Its Authorized Representative

Date September 25, 2008

Subscribed, Sworn to and Acknowledged before me this 25 day of Supermour, 2008.

My Commission expires:

5-25-2011

<sup>1</sup> In re Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005).

#### **Emergency Functionality Plan**

In the event of an emergency, Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage") is committed to the safety and security of its customers and recognizes the importance of having an emergency plan. As stated in its certification, Advantage is able to function in an emergency situation. Advantage has eight (8) hours of battery back-up power to ensure functionality without an external power source. Additionally, Advantage has installed built-in generators at several sites and has a mobile generator on hand to back-up its sites that do not have a built-in generator. Advantage has redundant SS7 routes with MCI and AT&T and therefore is able to re-route traffic around damaged facilities. Also, wireless traffic that is routed through Advantage's affiliated local exchange carrier is on a Sonic Fiber Ring. A Sonic Fiber Ring will immediately re-route any call that is stalled or stopped at any point in the network by finding an alternate call path. Through its various roaming arrangements, Advantage is capable of handling traffic spikes in an emergency situation. Further, Advantage has installed additional radios on several sites to handle increased capacity.



Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Equal Access Certification for October Compliance Filing

Dear Ms. Dortch:

On behalf of Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), pursuant to the Federal Communications Commission's ("Commission") 2005 Universal Service Order, I certify under penalty of perjury that Advantage understands and acknowledges that the Commission may require Advantage to provide equal access to long distance carriers in the event that no other ETC is providing equal access within Advantage's service area.

Leslie Greer

Advantage Cellular Systems, Inc.

Its Authorized Representative

Date September 25, 2008

Subscribed, Sworn to and Acknowledged before me this and day of sollwork,

Anita Patrick
NOTARY PUBLIC

My Commission expires:

5-25-2011

<sup>&</sup>lt;sup>1</sup> In re Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005).



Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Local Usage Certification for October Compliance Filing

Dear Ms. Dortch:

On behalf of Advantage Cellular Systems, Inc. d/b/a/ DTC Wireless ("Advantage"), pursuant to the Federal Communications Commission's 2005 Universal Service Order, I hereby certify under penalty of perjury that Advantage is offering a local usage plan comparable to that offered by the incumbent local exchange carrier in the relevant service areas.

Leslie Greer

Advantage Cellular Systems, Inc.

Its Authorized Representative

Date September 25, 2008

Subscribed, Sworn to and Acknowledged before me this day of

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NOTARY PUBLIC

My Commission expires:

5-25-2011

<sup>&</sup>lt;sup>1</sup> In re Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005).



Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Quality Service Certification for October Compliance Filing

Dear Ms. Dortch:

On behalf of Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), pursuant to the Federal Communications Commission's 2005 Universal Service Order, I hereby certify under penalty of perjury that Advantage is complying with applicable FCC service quality standards and consumer protection rules and those contained in CTIA's Consumer Code for Wireless Service.

Leslie Greer

Advantage Cellular Systems, Inc.

Its Authorized Representative

Date September 25, 2008

Subscribed, Sworn to and Acknowledged before me this 2 day of Systembly 2008

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JOTARY PUBLIC

My Commission expires:

5-25-2011

<sup>&</sup>lt;sup>1</sup> In re Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (March 17, 2005).